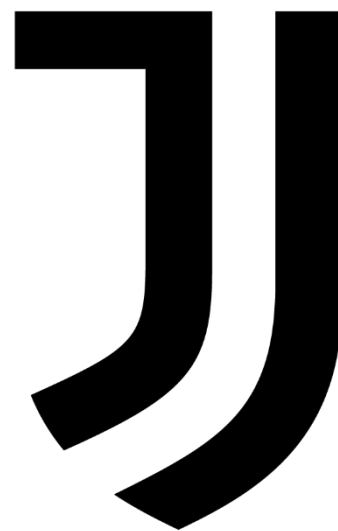


# CODE OF ETHICS

Approved by the Board of Directors  
on 23 May 2024





## INTRODUCTION

Juventus is a professional football club, listed on the Stock Exchange. With over a century of history, the club has succeeded in establishing itself as a leading team, both in Italy and internationally.

The fundamental goal of the Company is to give its supporters the greatest possible sporting satisfaction. This mission is to be pursued in a fair and sportsmanlike manner, combining the professional and business-related aspects of football with the ethical and social value of the sport, promoting conduct which is in keeping with club's tradition and worthy of the club's supporters and, more generally, of all sports enthusiasts.

Furthermore, Juventus strives to create value for its shareholders by promoting and increasing the value of its brand, maintaining a sports organisation of the highest technical level, and preparing and implementing projects designed to diversify the company's activities.

Juventus aspires to maintain and develop a relationship of trust with its "stakeholders", namely with those categories of individuals, groups or institutions whose interests are influenced by the direct and indirect effects of Juventus activity.

The Juventus Code of Ethics is based upon best practices and the applicable regulatory principles, guidelines and national and international documents on human resources, corporate social responsibility and corporate governance, including, by way of example, the OECD Guidelines for Multinational Enterprises and the main frameworks of the United Nations and the European Union.



## 1. CODE OF ETHICS USER GUIDE

### Recipients of the Code of Ethics

- 1.1 The “Recipients” of the Code of Ethics are the Directors, members of the audit bodies, footballers, human resources of the sporting and non-sporting areas, as well as other collaborators, occasional or otherwise, of Juventus.
- 1.2 “Footballers”, for the purposes of this Code, means the players of the first teams, professional teams and youth teams whose members, even if minors, are able to understand the ethical and social value of their actions.
- 1.3 “Human Resources” means all employees, whether temporary or seconded, as well as semi-subordinate workers and other persons who are part of the Company’s workforce (for example: technical, health and medical staff) irrespective of the contractual form, the regulations of reference or whether or not they are members.
- 1.4 “Other collaborators” means, for example, spectators, agents and intermediaries, as well as other occasional collaborators of Juventus regardless of their professional category and the contractual form.
- 1.5 “Suppliers”, “Licensees”, commercial and corporate partners (hereafter also “Partners”) and the “Other parties” with whom Juventus maintains contractual relations are also Recipients and required to comply with the Code of Ethics, as well as anyone undertaking activities in the name and on behalf of Juventus or under the control thereof, whether they are natural or legal persons.
- 1.6 Recipients are obliged to observe the principles contained in the Code of Ethics, as far as they apply, and shall be subject to penalties for the breach of any of its provisions. The sanctions depend on the type of relationship with Juventus.

### Dissemination and knowledge of the Code of Ethics

- 1.7 The Code of Ethics is published on the Company’s website ([www.juventus.com](http://www.juventus.com)).
- 1.8 The Company ensures maximum dissemination and knowledge of the Code of Ethics at all levels of its organisation. All Recipients are required, by virtue of the employment relationship or the contract that binds them to Juventus, to comply with the Code.
- 1.9 In contractual relationships with the external parties referred to in Article 1.5, Juventus requires this Code of Ethics to be read and accepted by the counterparty unless the same has its own code of ethics, in which case Juventus and the counterparty shall mutually acknowledge that they have read their respective codes of conduct on condition that the principles contained in the Code of Ethics of the counterparty are compatible with those of Juventus.



## 2. GENERAL PRINCIPLES

### Impartiality and inclusiveness

- 2.1 Juventus rejects all forms of discrimination, including social, racism, xenophobia and intolerance.
- 2.2 Juventus undertakes to avoid any discrimination from its conduct and to respect, in relations with its stakeholders, differences in age, gender, orientation and sexual identity, ethnicity, religion, health status, political and trade union affiliation, language or different skills.

### Integrity

- 2.3 Within the scope of the activities carried out for Juventus, Recipients are required to comply with the laws in force of each of the regulations within which the Company operates, the applicable sporting regulations and the Code of Ethics. Under no circumstances shall the pursuit of Juventus' interest justify any failure to compliance with the above.
- 2.4 Juventus rejects any form of violence. All the activities of Juventus must be carried out with honesty, integrity and fairness in respect of the stakeholders involved and within a framework of sporting competitiveness and fair business practices.
- 2.5 In particular, Juventus expects of its employees and players, in carrying out their duties, behaviour which is ethically irreproachable, as well as legally and professionally appropriate, in order to strengthen mutual trust and consolidate the reputation of the Company, while avoiding any behaviour that could damage it. They must operate with integrity and probity in the relationships between each other, with the Directors and with the Juventus shareholders, with competing companies, with representatives of sporting bodies and the public administrations and with all third parties in general, whether counterparties in negotiations or other stakeholders.

### Correctness in the event of potential conflicts of interest

- 2.6 In the conducting of any Juventus activity or on behalf of Juventus, Recipients must always avoid situations where they themselves have or even appear to have, a conflict of interest with respect to other parties involved. Recipients are required to report the occurrence of such situations, in compliance with the specific internal procedures adopted by the Company.
- 2.7 Recipients must not seek to derive any undue personal advantage, pursue interests other than Juventus' corporate objectives, or act counter to the contractual and/or fiduciary duties that bind them to the Company.
- 2.8 There should be no conflicts of interest in conducting relationships with players, registered personnel, directors and representatives of other sporting clubs or sporting bodies, or with sporting intermediaries.
- 2.9 Particular attention must also be used in the case of transactions with related parties, which are also subject to specific regulations contained in the Company's specific internal procedures.



## **Transparency and completeness of information**

- 2.10 The human resources of Juventus, in relations with third parties, whether they are negotiating counterparties or other stakeholders, are required to provide complete, transparent, understandable and accurate information, without prejudice to the protection of the confidentiality of information and personal data (see Arts. 9 and 10) in such a way that, in establishing relations with the Company, third parties are able to make independent decisions while being aware of the interests involved, the alternatives and the relevant consequences. In particular, in the formulation of any contracts, Juventus takes care to specify, for the contracting parties, the behaviour to be maintained in all foreseeable circumstances, in a clear and understandable way.

## **Sustainability and social impact**

- 2.11 Through its values, football can facilitate and contribute to a greater social impact, particularly among the younger generations. Juventus recognises its role in society and, using an essential social element, represented by sport, contributes actively - within the framework proposed by the United Nations - to achieving the 2030 Agenda for Sustainable Development and its 17 sustainable development goals (SDGs). Creating value and maintaining a relationship of trust with its stakeholders is a priority for Juventus, which is aware that it plays an important role in the community where it operates. This is why the Company recognises the importance of integrating sustainability into its business, undertaking to report periodically on its social and environmental impact in the Non-Financial Statement.
- 2.12 Juventus is committed to implementing continuous improvements regarding environmental protection, minimising the environmental impact deriving from its social activities, and from the construction, maintenance and management of sites and property.
- 2.13 Within its corporate activities and relations with third parties, Juventus undertakes to adopt responsible attitudes to safeguard the environment, acting in strict compliance with the applicable regulations, as well as the limits defined by any authorisations and requirements received from the competent bodies.

## **3. HUMAN RESOURCES**

- 3.1 Relations between colleagues, even with different hierarchical levels and in respect of the roles exercised, must always be based on the principles of civil coexistence, loyalty, inclusiveness and correctness and must be carried out with mutual respect for the rights and freedom of individuals, by promoting the value of diversity and avoiding any possible forms of discriminatory behaviour.
- 3.2 The managers of organisational structures and specific activities must exercise the powers connected to their function and/or the delegation received with objectivity and balance, maintaining fidelity to Juventus and its administrative bodies, and, at the same time, respecting the dignity of their collaborators of whose professional growth they must take proper care. With regard to the procedures for exercising the powers granted, reference must be made to the provisions of the Articles of Association and to the system of delegations and powers of attorney of the Company.
- 3.3 All human resources must cooperate fully in carrying out their duties by observing the provisions for the execution and for the regulation of the work given by their manager(s) and, in general, by the Company.



## **Human capital management policy**

- 3.4 Juventus undertakes to create a peaceful working environment in which everyone can work in compliance with the laws, principles and shared ethical values.
- 3.5 Juventus ensures that employees behave and are treated with dignity and respect, within the framework of the provisions of the laws governing labour relations, the "Company Rules on employment relationships" adopted by the Company and any other applicable internal rules.
- 3.6 Within its organisation Juventus does not tolerate any form of discrimination, exploitation, harassment, abuse (both physical and psychological), bullying, negligence, carelessness, ostracising for personal or work reasons; situations of this nature will be investigated and punished with termination of the employment or collaboration relationship.
- 3.7 Juventus shall not apply any disciplinary or contractual sanctions against employees or other collaborators who have legitimately refused to provide a work service that has been unduly requested of them by any person linked to the Company. Juventus protects those who report such situations in good faith and in detail, as specified in Article 17 below.
- 3.8 Juventus is opposed to "undeclared employment" and to child and underage labour, as well as to any other conduct involving exploitative labour or which offends one's individual personality. All employees and co-workers are hired through standard contracts of employment. Human resources are duly and fully informed of the rights, duties and obligations arising from the contract.
- 3.9 Juventus promotes the cultural growth of its staff, enhancing the value of professionalism and character by providing appropriate training tools for professional growth.
- 3.10 Activities involving the selection of new human resources, as well as the management of remuneration policies and career paths, are based on strictly meritocratic criteria.

## **Specific principles applicable to the Youth Sector**

- 3.11 One of Juventus's primary objectives is to promote positive values in sport for young people, in the knowledge that setting a good example to children and adolescents is the most immediate means of teaching mutual respect.
- 3.12 To this end, Juventus requires all persons who work in the youth sector to observe the principles, obligations and general prohibitions detailed above, as well as those described below.
- 3.13 Juventus undertakes to supervise the underage youth team players continuously, ensuring, within the limits of its responsibility, that they are never unsupervised.
- 3.14 Relations with young sportspeople must be carried out in an irreproachable manner in terms of ethical correctness. Juventus promotes a way of interaction among young athletes, within the various youth sector activities, that absolutely rejects bullying and/or cyberbullying, requiring compliance with internal regulations and procedures from all young athletes.
- 3.15 Juventus does not tolerate any form of abuse of young athletes, be it psychological or physical.



- 3.16 *The guidance and education of youth team players must be conducted on the basis of models that promote ethical and humanitarian principles in general, and which specifically promote fair play in sport.*
- 3.17 Juventus demands the maximum commitment to preserving the mental and physical health of young people: to this end, it reiterates its dedication to preventing the practice of doping, along with any other behaviour that could even indirectly imply their abuse and/or commercial exploitation.
- 3.18 Juventus condemns the use of narcotics.
- 3.19 Juventus strives to ensure that technical motor skills, the culture of commitment, healthy competition, the positive concept of oneself and good social relationships are developed in training and competitions.

#### **4. OCCUPATIONAL HEALTH AND SAFETY**

- 4.1 Juventus is committed to spreading and consolidating the culture of safety and health in the workplace, developing awareness of the dangers and risks involved, promoting responsible behaviour on the part of Human Resources and working to preserve, in particular with preventive actions, the health and safety of workers.
- 4.2 The company's business activities are performed in compliance with the laws in force on occupational health and safety. In particular, the management of the "safety system" is based on the following principles:
- assessing and managing risk, including risks that cannot be avoided;
  - combating risks at their source;
  - adapting the working environment to people, particularly with regard to the design of workstations and the selection of tools and work methods;
  - taking technical developments into account;
  - replacing dangerous items and practices with non-dangerous or less dangerous alternatives;
  - planning prevention with coherent actions that integrate technology, work organisation, working conditions, social relationships and the influence of work environment factors;
  - giving the utmost priority to collective protective measures with respect to individual protective measures;
  - providing workers with adequate instructions.
- 4.3 Juventus also undertakes, within the limits of its tasks and responsibilities, to ensure the safety of the public accessing its facilities for sporting entertainment.

#### **5. RELATIONS WITH PUBLIC AUTHORITIES**

- 5.1 The human resources of Juventus must be familiar with and respect, where applicable, the guidelines issued by the Company with regard to relationships and requirements when interacting with the Public



Administration, as well as the guidelines on gifts and donations. These guidelines must be applied across all areas in which Juventus is active and where the company has relations with public administration bodies and representatives thereof. In particular:

- with regard to requests addressed to the Public Administration for the provision of measures relating to Company activities;
  - on all occasions involving contact with parties engaged in carrying out inspections and visits at Juventus offices, in order to verify compliance with legal provisions and/or requirements;
  - on all occasions which involve contact with public administration bodies for institutional, commercial or supply reasons;
  - when fulfilling obligations or requirements of the Public Administration.
- 5.2 Juventus behaves correctly and transparently in the conduct of negotiations and dealings with the Public Administration, as well as in the execution of any legal or prescription requirements dictated by the same.
- 5.3 Juventus's relations with civil servants (including clerks of public authorities – regardless of whether these are employees of the state or otherwise – and public service agents) are based on transparency, trust and integrity: Juventus does not wish to create any suspicion of wishing to influence those persons unduly in order to obtain benefits by illegal means.
- 5.4 Juventus condemns any behaviour that could constitute an act of corruption against private individuals, for which reference should be made to the following Article 7.6. Any attempted extortion, bribery or inducement to provide an undue benefit by a public official or a public service representative must be reported without delay.
- 5.5 Recipients of the Code of Ethics must disclose any business relationships or economic activities undertaken in a personal capacity with public officials.
- 5.6 In light of the above, no Recipient may:
- attempt to gain improper influence over the decisions of the various administrations concerned, with particular regard to officials who deal with such administrations or make decisions on their behalf;
  - offer, promise or grant money, goods, favourable conditions or other undue advantages, in any form, directly or indirectly, to anyone (regardless of whether the individual in question is a director, officer or employee of a public authority or a private individual in charge of or employed in public services, or directly related or related by marriage, cohabiting or in any other way associated with such an individual), in view of this person performing an official act, or exert undue influence on a decision in order to promote or favour the interests of the company, even as a result of illicit pressure or persuasion from the beneficiary of such an act or decision. Human resources are permitted to offer free gifts and donations for commercial use of modest value in accordance with the procedure on "Gifts and donations";
  - send false documents or manipulated documents, attest to non-existent requirements or provide guarantees that do not correspond to the truth;
  - unduly procure any type of gain (licences, authorisations, reductions or exemption from charges, including social security contributions etc.) using means that are fraudulent or deceitful (for example, the submission of false documents or certifying facts that are untrue);





- perform economic activities, assign professional roles, give or promise gifts, cash or other benefits to civil servants or public authority employees involved in administrative proceedings that may result in benefits for Juventus;
- modify in any way the function of an IT or on-line system of a public authority or third-party system or unlawfully intervene in any manner on data, information or programmes contained in any of the aforementioned systems;
- unlawfully receive contributions, funding, facilitated loans or other disbursements of any nature, granted or paid by public authorities, through the use or submission of false or untruthful documents, or through the omission of information;
- use contributions, subsidies or funding designated for public works or perform activities in the public interest for purposes other than those for which the same were granted;
- illegally exchange information on bids with participants of any tenders or public procedures.

- 5.7 It is an infringement of Juventus's company policy to adopt conduct that is considered a bribery offence, including when committed in foreign countries where such conduct is not punished or otherwise prohibited.
- 5.8 In general terms, relations with the Public Administration on behalf of Juventus must be managed by delegated or duly authorised parties.
- 5.9 Juventus acts in compliance with the law and supports, within the limits of its purview, the correct administration of justice.
- 5.10 In carrying out its business, Juventus operates lawfully and correctly by cooperating with the judicial authorities, law enforcement agencies and any public official who has powers of inspection and carries out investigations against it.
- 5.11 In anticipation of a judicial proceeding, an investigation or an inspection by the Public Administration or the Supervisory Authorities, no one may destroy or alter any records, minutes, accounting records or any other type of document, nor lie or make false statements to the competent authorities.
- 5.12 No one may try to persuade others to provide false or misleading information to the competent authorities.
- 5.13 No one may undertake economic activities, confer professional appointments, give or promise gifts, money or other benefits to those who carry out inspections and inspections, or to the competent authorities.

## **6. DONATIONS FOR POLITICAL PURPOSES**

- 6.1 These contributions require the prior approval of the Board of Directors of the Company and must be provided within the limits and in the forms provided for by the applicable regulations.



## **7. RELATIONS WITH SUPPLIERS, LICENSORS, PARTNERS AND OTHER CONTRACTUAL**

### **COUNTERPARTIES**

- 7.1 Juventus sets up relations with suppliers, licensees and partners exclusively on the basis of criteria of trust, quality, competitiveness, professionalism and respect for market dynamics.
- 7.2 In particular, Juventus strives to select Suppliers and Licensors based on evaluation criteria that include, in addition to the quality and affordability of the offering, aspects such as reputation, reliability, professionalism, efficiency and sustainability, so as to allow the establishment of a solid and lasting fiduciary relationship. Juventus avoids entering into agreements with suppliers of dubious reputation that may not reflect the values expressed in this Code of Ethics in line with the principles of the Global Compact promoted by the UN, such as respect for the environment, working conditions, human rights and the principles of legality, diversity and inclusion, respect for competition and the fight against corruption.
- 7.3 The same principles are adopted in the evaluation of Partners, which are required to share the values of this Code of Ethics, also to safeguard the reputation of the Juventus brand and company.
- 7.4 Juventus expects that Suppliers, Licensors and Partners will not receive any undue pressure to perform services not provided for contractually.
- 7.5 When requesting compliance with this Code of Ethics as applicable to them (see Article 1.9), Juventus expects conduct from Suppliers, Licensors, Partners and Other parties that complies with the principles contained therein. Any contrasting conduct may be considered a serious breach of the duties of correctness and good faith in executing the contract with Juventus, damaging the relationship of trust and constituting just cause for termination of the contract itself.
- 7.6 No Recipient of this Code of Ethics may promise or grant money, assets in kind, facilities or other benefits, directly or indirectly and in any form, to any individual representing a counterparty of Juventus (whether they are a director, general manager, manager or employee of a private company, or even a statutory auditor or liquidator) in order to guide a decision or to influence the performance of deeds or the conclusion of commercial agreements or, in general, to promote or favour the interests of Juventus or to wrongly damage a competitor. Gifts and business courtesies of modest value are permitted in accordance with the guidelines defined by the Company and formalised in the appropriate documents.

## **8. TRANSPARENCY OF ACCOUNTING AND INTERNAL CONTROLS**

### **Corporate communications and accounting records**

- 8.1 Accounting transparency is based on truth, accuracy and completeness of the basic information for accounting records. The business functions involved are required to take action so that the management facts are represented correctly and promptly in the accounts.



- 8.2 Supporting documentation is filed among the records of each transaction, which allows for: (i) simple accounts recording; (ii) identification of authorisation levels; (iii) careful reconstruction of transactions, also to reduce the probability of errors of interpretation.
- 8.3 Each record must reflect exactly what is shown in the supporting documentation. It is the task of the company functions involved to ensure that the documentation is easily traceable and ordered according to logical criteria.

### **Internal controls**

- 8.4 It is the policy of Juventus to raise awareness at all levels of the need for supervision over activities, characterised by an awareness of the internal control procedures and the positive effects thereof in improving efficiency.
- 8.5 Internal controls are all those tools that are necessary or useful for directing, managing and verifying the activities of the Company with the aim of ensuring the credibility, accuracy, reliability and timeliness of the information provided to the corporate bodies and the market, the safeguarding of company assets, the effectiveness of company processes, compliance with laws and regulations as well as with the Articles of Association and internal procedures.
- 8.6 The responsibility for implementing an effective internal control and risk management system concerns, in various guises, every level of the organisational structure; consequently the directors, members of the audit bodies and all the human resources, each within their own function, must contribute to the definition, operation and monitoring of the internal control and risk management system.
- 8.7 Within the scope of their responsibilities, the heads of organisational units are required to participate in the internal control and risk management system and to involve their collaborators.
- 8.8 The Company appoints an Internal Audit Manager with the task of verifying that the internal audit system is adequate and fully operational. Internal Audit has direct access to all information useful for the performance of its duties and has adequate resources to perform the function assigned. The Internal Audit Manager reports on his/her work to the other management and audit bodies of the Company.
- 8.9 The Independent auditors have free access to the data, documentation and information required for performing their auditing work.
- 8.10 The Directors and Human Resources must not impede or hinder in any way audit activities by the statutory auditors, the shareholders and independent auditors.
- 8.11 In light of the above:
- the corporate equity, the assets, credits and shares must be correctly valued, and the same must not be assigned values above or below that which are due;
  - no transactions may be performed on share capital, nor any other type of transaction, that envisage the use of non-distributable earnings or reserves that are required by law;
  - the share capital may not be reduced, except for in the event of losses or write-downs;



- directors may not purchase or subscribe shares or quotas of the company unless to do so they use their own funds;
- the aims stated in the company bylaws should be pursued;
- the management of corporate equity must be in line with the organisational status and business activities of Juventus, which operates according to principles of transparency and morality;
- shareholders may not be released from the obligation of making contributions.

8.12 The same principles must be adopted in evaluations and in any other extraordinary operations (mergers, demergers, etc.).

8.13 All parties are prohibited from influencing the regular performance and decisions of shareholders' meetings by seeking to deceive or mislead the shareholders.

## **9. COMPANY COMMUNICATION AND INFORMATION CONFIDENTIALITY**

9.1 Internal and external company communications must be clear, precise and truthful in order to avoid inaccurate news and information being made public or the creation of situations entailing liability of any kind for the Company.

9.2 To protect the reputation of the Company, the value of the brand and the confidentiality of information, any disclosures to the media and the public of any information relating to Juventus are managed exclusively by the spokespersons and the organisational structures that are expressly responsible: the remaining Recipients must refrain from any such communications.

9.3 Confidential information related to Juventus, which has not already been made public (such as, for example, contracts, disciplinary and judicial proceedings, salary information, etc.), must not be disclosed externally, including via digital and social media; it is also forbidden to distribute contents, images, written documents or audio-video content owned by Juventus, without authorisation.

9.4 Recipients are requested not to disclose any information that is untrue, defamatory, detrimental to Juventus' image or detrimental to the dignity of any other external person who is in some way associated with or could be associated with Juventus.

9.5 Confidential information and documents, work projects and know-how must be kept and protected in an appropriate and continuous manner both with respect to third parties and to colleagues who are not directly concerned with them. Those who, for reasons related to work, have access to them must, in any case, follow the instructions and procedures laid down by the company.

9.6 In the event that third parties, deliberately and/or fraudulently, should seek to obtain confidential information from a Recipient of this Code of Ethics, the latter must promptly notify his/her contacts within the organisation.



## **10. PROTECTION OF PERSONAL DATA**

- 10.1 Juventus adopts organisational and security measures for the correct processing of personal data in its possession, in compliance with applicable European and national legislation.
- 10.2 Personal data must be processed in proportion to the consent received and the purposes of the processing, and not disclosed outside without consent. Those who, for work reasons, have access to these data must follow the instructions and procedures established by the Company.

## **11. ABUSE OF INSIDE INFORMATION - INSIDER TRADING**

- 11.1 "Inside Information" is specific information not publicly known – as specified in Art. 181(3) of Italian Legislative Decree no. 58 of 1998 (Consolidated Finance Law) – relating directly or indirectly to the Company or to one or more financial instruments issued by the Company which, if made public, could have a significant impact on the price of the listed financial instruments.
- 11.2 It is forbidden to use or communicate to others, without justified reason, any inside information regarding Juventus or another listed company with which Juventus has business relations.
- 11.3 Recipients of the Code of Ethics, if in possession of inside information, must immediately inform the Company in order to manage it within the terms and with the procedures indicated by the law and according to the relative procedure adopted by the Board of Directors.

## **12. COLLECTIONS AND PAYMENTS**

- 12.1 Juventus exercises its business in full compliance with current anti-money laundering regulations, where applicable, and the provisions issued by the competent Authorities.
- 12.2 To this end, human resources must operate in compliance with company procedures, and avoid carrying out any transactions which are suspicious in terms of fairness and transparency. In particular, the available information concerning active and passive counterparties (suppliers, partners, other collaborators) must be verified in advance in order to ascertain their respectability and the legitimacy of their activity; in addition, credit cards or payment cards or any similar document that authorises the withdrawal of cash or the purchase of goods or performance of services or in any case any other payment instrument other than cash must not be unduly used, not being their holders.
- 12.3 The counterparties of Juventus also undertake to operate in such a way as to avoid involvement in transactions that may also be potentially suitable for promoting the laundering of money deriving from illicit or criminal activities.
- 12.4 With specific reference to traceability and the storage of records, the Recipients must observe the following recommendations:
  - all payments and other money transfers made by or to the Company may not be made in cash and



bearer passbooks or any other means considered equivalent to cash must not be used, with the exception of ticket sales activities for sporting events, for access to the Museum and Stadium Tour and for the purchase of material available at Company official stores;

- all payments and other transfers made by or to the company must be accurately and wholly registered in the accounts and in mandatory records;
- all payments must only be made to addressees for work agreed contractually and/or resolved upon by delegated parties;
- false, incomplete or misleading entries must not be made and hidden unregistered funds must not be set up, neither may funds be deposited in personal accounts or accounts that do not belong to the company, nor may unauthorised use be made of company funds or resources.

### **13. PROTECTION OF COMPANY ASSETS**

- 13.1 Juventus' social assets must be managed in an efficient and honest manner and, therefore, all subjects required to comply with this Code of Ethics contribute to preserving their integrity and value, to protect shareholders, creditors and investors.
- 13.2 Footballers and human resources are responsible for the conservation and protection of the assets and tools entrusted to them by Juventus and must contribute to ensuring the protection of the entire company assets, respecting the operational and safety procedures established by the Company.
- 13.3 The Juventus brand, in all its forms, must be protected and valued. Each Recipient must comply with the contractual limitations and provisions governing the use of the brand and the methods of enjoying the rights contractually acquired.
- 13.4 In all cases, documents regarding the activities of the Company, company equipment, work tools and all other assets, whether tangible or intangible, made available and/or sold, including tickets to sporting events, must be used by the same exclusively to achieve the purposes of the Company and in the manners established by it. They may not be used for personal purposes or transferred or made available, even temporarily, to third parties.
- 13.5 Juventus guarantees the conservation and promotes awareness of the cultural assets which it safeguards by way of identification, protection, use, development and custody, for the sole purpose of raising awareness of their public use.

### **14. CRIME PREVENTION AND INTERNAL ORGANISATION MODELS**

- 14.1 Juventus expects that the Recipients, each within the scope of their activities carried out for Juventus, do not engage in unlawful conduct constituting the offences referred to in Legislative Decree 231/2001.
- 14.2 Juventus has adopted an Organisational, Management and Control Model pursuant to Legislative Decree 231/2001, as well as internal procedures, in order to direct the Company's actions in such a way as to significantly limit the risk of commission of the offences provided for by Legislative Decree 231/2001.



- 14.3 Juventus expects the Recipients of the Code of Sports Justice, each within the scope of their activities carried out for Juventus, not to behave unlawfully or contrary to the principles of loyalty, fairness and probity in every relationship.
- 14.4 Juventus has adopted an Organisation, Management and Control Model pursuant to Art. 7(5) of the FIGC Articles of Association (Prevention Model) in order to direct the Company's actions in such a way as to significantly limit the risk of unlawful conduct or behaviour contrary to the principles of loyalty, fairness and probity in every relationship. This Model was updated in accordance with the principles stated in the Official Communication no. 87/A issued by the FIGC on 31 August 2023.

## 15. RULES OF CONDUCT IN SPORTS ACTIVITIES

- 15.1 There is a zero-tolerance approach to doping: Juventus condemns the practice of doping and is committed to avoiding the inadvertent use of doping substances, acting in full compliance with applicable international and national sporting regulations.
- 15.2 Juventus strives to spread the culture of combating match-fixing practices, in harmony with international and national sports bodies. In this regard, it adopts internal training initiatives and imposes bans and regulations on its own registered personnel.
- 15.3 Juventus strives to spread an inclusive culture and environment, which ensures the dignity, respect, rights, equality and inclusion of all members, and to prevent and condemn all types of harassment, violent or discriminatory conduct, while ensuring education and training in healthy sports activities. The principle of protection and safeguarding must always be guaranteed when carrying out sporting activities, with particular reference to risky activities such as organising trips, travel and transfers;
- 15.4 Without prejudice to the principles of conduct indicated so far, each of the parties who are Recipients of this Code of Ethics must behave according to the principles of loyalty, correctness and probity in any relationship in any case referable to sporting activity. In particular:
- a) as regards sporting competitions: they must refrain from carrying out, by any means, any acts aimed at altering the course or result thereof. Any offer of money, other benefits or advantages (whether direct or indirect) to directors, managers or members of other football clubs, representatives of F.I.F.A., U.E.F.A., F.I.G.C. and A.I.A., aimed at altering the result of sports competitions or at favouring or conditioning the conclusion of agreements for the transfer of players or registrations, is prohibited;
  - b) as to relationships with sports authorities: within the context of their responsibilities, they will maintain relations of honest cooperation with the authorities and work with them, safeguarding the autonomy of all parties. In particular, they produce and supply all documents requested by the Authorities and by CO.VI.SO.C. without any omissions or tampering;
  - c) as to relationships with football players (even third parties), other members (even third parties) and intermediaries: they shall refrain from carrying out any activity in any way related to the registration, transfer or sale of the sporting services of players and coaches except in the exclusive interest of the Company and in compliance with the applicable regulations. It is forbidden to stipulate or otherwise pay to intermediaries or in any case to registered personnel, any remuneration, bonuses or



indemnities which are unjustified and/or in breach of the applicable regulations;

- d) as to relationships with supporters: they promote loyal and responsible support. Juventus abstains in any case from contributing, through financial interventions or other illicit facilitations, to the establishment or maintenance of groups, organised or not, of its own fans;
- e) as to doping: they must adhere scrupulously to the rules dictated in the fight against doping and safeguard the physical and mental health of the players and the fairness of sporting competitions;
- f) as to match-fixing: they must refrain from making or accepting or facilitating bets, either directly or through a third party, or to persons authorised to receive them, or not, regarding the results of matches and/or official competitions in which the Company participates and in any case organised by FIFA, UEFA or the FIGC.

- 15.5 Any Recipient who has become aware that companies or persons have carried out or are about to carry out any act that runs contrary to the principles indicated in Art. 15.4 above must inform the Federal Prosecutor without delay and the Company's Anti-Abuse, Violence and Discrimination Officer
- 15.6 All Recipients shall refrain from publicly expressing judgments prejudicial to the reputation of other persons, registered personnel or otherwise, according to the provisions of Art. 9.4.
- 15.7 Every year the Company prepares and distributes to the interested parties the regulations and the informative documentation for compliance with the provisions set forth in the previous points.

## **16. IMPLEMENTATION OF SANCTION SYSTEM**

- 16.1 The Company undertakes to focus on achieving best practices in relation to its business, ethical and social responsibilities towards its shareholders, its human capital and other stakeholders. The Code of Ethics defines the Company's expectations regarding the Recipients and the responsibilities they must take on to transform these policies into concrete actions.
- 16.2 The Company and, above all, its directors and managers, undertake to ensure that these policies and expectations are understood and put into practice within the organisation. They are accountable to the audit bodies of the Company and are required to take an active part in implementing the commitments expressed in the Code of Ethics.
- 16.3 Breaches of the Code of Ethics are punishable by sanction, proportionate to the severity and set out according to the type of relationship that the Recipient in question has with Juventus. The measures also include the termination of the relationship of trust with the Company with the contractual consequences envisaged and permitted by the regulations in force.
- 16.4 Any sanctions against human resources for breaches of the Code of Ethics shall be adopted in accordance with the applicable legislation, as well as with the "Company Rules on employment relationships", where applicable. For the Footballers, the contracts and the relevant legislation shall apply.
- 16.5 For the other collaborators, Suppliers, Licensors and Partners, Juventus reserves the right to terminate the contract or apply other contractual measures, by virtue of clauses specifically provided for the purpose, as





already mentioned in Art. 7.5.

- 16.6 The Control and Risk Committee may be involved in the assessment of possible breaches by top management according to the internal procedures envisaged.
- 16.7 The Directors assess the adequacy of this Code of Ethics with respect to the evolution of the business or of the main applicable legislation.
- 16.8 The Supervisory Body, in addition to its powers relating to the Organisation, Management and Control Model adopted by the Company, is also required to express binding opinions on the opportunity of reviewing this Code of Ethics, as well as internal policies and procedures for the purpose of ensuring consistency with the same Code of Ethics.

## **17. REPORTING BREACHES OF THE CODE OF ETHICS**

- 17.1 Any situations of suspected breach of the provisions of this Code of Ethics, by one or more Recipients, may be reported, without delay, by any Recipient, provided that the report is submitted in good faith and substantiated, or based on justified reasons.
- 17.2 Through the Whistleblowing portal available on the Company's website in the Corporate Governance section ([WB Institutional Website](#)), Juventus allows internal and external Stakeholders to submit reports in order to encourage the disclosure of conduct contrary to the Code of Ethics and the principles of loyalty, correctness and honesty, as well as of acts and omissions which involve cases of abuse, violence or discrimination identified in the FIGC Safeguarding Guidelines and violations of national and European Union regulations that harm the public interest or the integrity of the public administration or private body, as referred to in the applicable regulations. Additional reporting channels made available by Juventus are indicated in the reporting management procedure published in the "Governance, Risk & Compliance repository" SharePoint section (Risk, Compliance & Internal Audit folder) and on the website (Club/Corporate Governance/Whistleblowing).
- 17.3 Reports shall be processed promptly and through the process defined in the aforementioned procedure.
- 17.4 Juventus undertakes to keep the Whistleblower's identity confidential, without prejudice to the legal obligations and the protection of Juventus's rights or of those of persons accused wrongly and/or in bad faith.
- 17.5 Juventus protects, in good faith, Whistleblowers and other persons needing protection against any form of retaliation, discrimination and/or penalty: where such behaviour is detected, Juventus shall take the appropriate steps.
- 17.6 Likewise Juventus shall be able to react under applicable law to those who should knowingly make false, unfounded or specious reports.



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